

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Katherine M. Cleary, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 4:21-cv-00184-O
	§	
American Airlines, Inc.,	§	
	§	
Defendant.	§	

JOINT MOTION TO ENTER SCHEDULING ORDER

This Court originally entered a Scheduling Order in this matter on April 8, 2021. ECF No. 21. On February 4, 2022, the Court granted the Parties' Agreed Motion to Modify the Scheduling Order (the "Motion") and extended the deadlines in this matter by 90 days. While the Court granted the Motion and extended the deadlines by 90 days, certain dates from the original Scheduling Order were not specifically referenced. As those dates approach, the Parties hereby move the Court to enter an order addressing those deadlines as set forth below. Please note that Plaintiffs are contemporaneously filing an unopposed motion for continuance of the trial date, along with a request to continue all associated deadlines. If that unopposed motion is granted, then this motion is moot.

If the Court does not grant Plaintiffs' unopposed motion, the parties request that the Court enter agreed schedule proposed below. The proposed dates below closely track the timing of the Court's scheduling order, adjusted to accommodate the parties' specific schedules (e.g., the Scheduling Order required lead counsel to meet face-to-face to discuss the charge 31 days before the original window for trial opened and the proposed schedule sets that meeting to occur 25 days before the trial window opens).

5/19/22	Pretrial Disclosures; Objections due 14 days thereafter
5/31/22	D/L for Plaintiff to provide Defendant with a copy of Plaintiff's proposed Jury Charge
5/31/22	D/L to file any Objections to, or Motions to Strike or Exclude Expert Testimony (including Daubert motions)
6/1/22	D/L for Defendant to provide to Plaintiff (1) any objections Defendant has to Plaintiff's proposed Jury Charge and (2) any additional instructions or questions Defendant wishes to add to the proposed Jury Charge
6/2/22	Face to Face meeting of lead counsel for each party to: (1) attempt to resolve differences as to language to be included in the Jury Charge; and (2) identify areas of disagreement that cannot be resolved
6/3/22	Deadline to File Motions in Limine
6/6/22	By 2:00 PM D/L for Counsel for Plaintiff to file "Agreed Charge" with the Court
6/6/22	D/L for Parties to file any proposed voir dire questions
6/9/22	Pretrial Materials
6/13/22	D/L for parties to hold Face to Face meeting to discuss Settlement (written Joint Settlement Report to be filed within seven day of settlement conference)
6/20/22	D/L to file and serve Responses to Motions in Limine
6/20/22	Exchange of Exhibits
6/20/22	D/L to file written Joint Settlement Report (MUST be filed within seven (7) days of having settlement conference)
TBD	Pre-Trial Conference
6/27/22	Trial

Dated: April 28, 2022

Respectfully submitted,

By: /s/ Oren S. Giskan

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Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF system on this 28th day of April 2022.

/s/ Lars L. Berg

Lars L. Berg